

US DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

Michael Baer, plaintiff

Michael Maloney, et. al.

CA # 05-11045-GAO

Plaintiffs Motion to
Compel production of
Documents

Now comes the plaintiff, Michael Baer on the above entitled heading, pursuant to Fed.R.Civ. Proc 34, request that this Honorable court order the defendants to provide him with the listed documents herein within a 30 day period so that he may use these documents as exhibits. Defendants have failed to respond to the "good faith" request.

1) Any and all policies and orders relating to use of force moves.

2) All Staff Incident reports written in regards to the extraction Team forced move on plaintiff on 6/26/02.

3) Copy of the Special management Unit (SMU) Rules and Regulations.

- 4) Copy of All Color photographs taken by TPS in regards to the extraction Team incident including photographs of the plaintiff, his cell and the unit itself.
- 5) Copy of inventory list of all property taken out of plaintiff cell during this extraction.
- 6) Copy of all TPS interviews in regards to inmates ~~Statement~~.
- 7) Copy of complete medical files of plaintiff.
- 8) Copy of All videotapes taken during this extraction team forced move.
- 9) Copy of listing of all personal staffs and medical staffs names etc. who were present during this force move as a supervisor.
- 10) Copy of All Defendants personal files in regards of them being Disciplined or any charges of abuse upon inmates.

1) Copy of Results of Internal Investigations
done in regards to this incident

Respectfully Submitted,



Michael Baer #66027

P.O. Box 100

So. Walpole, MA

02071-0100

Date: 12/28/05

Certificate of Service

I, hereby certify on this 28th day of December 2005, I served a true copy of the foregoing upon The Doc's assigned Counsel by first class mail.



Michael Baer W6027

Po Box 100
So Walpole, MA

02071-0100